

UNITED STATES BANKRUPTCY COURT FOR THE
MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : NO. 24-03264-HWV
Irene Papoutsis Mulkerin :
Debtor : Chapter 7

REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE

NOW COMES Trustee, Steven M. Carr, by and through his counsel, Steven M. Carr, Esquire, and respectfully requests this Honorable Court enter an Order continuing the Hearing on Motion to Compel Production of FLP Tax and Financial Reports and Amended Motion for Derivative Standing scheduled for Tuesday, July 15, 2025, at 9:30 a.m., and in support thereof states as follows:

1. Debtor filed a voluntary Chapter 7 bankruptcy petition on December 18, 2024. (Docket No. 1)
2. Debtor filed an Emergency Motion to Compel Production of FLP Tax and Financial Records on June 23, 2025 (Docket No. 463) and an Amended Motion for Derivative Standing on June 26, 2025. (Docket No. 477).
3. The Trustee filed an Objection to Debtor's Emergency Motion to Compel Production of FLP Tax and Financial Records on July 2, 2025 (Docket No. 501).
4. The Trustee filed an Objection to Debtor's Amended Motion for Derivative Standing on June 27, 2025 (Docket No. 483).
5. Hearings on both Motions are scheduled for July 15, 2025, at 9:30 a.m.
6. Hearing on additional Motions in this matter are scheduled for July 22, 2025 at 9:30 a.m.
7. The Trustee requests this matter be continued to July 22, 2025, at 9:30 a.m. so that all matters may be addressed at the same time.

8. Debtor concurs with this request.

WHEREFORE, Steven M. Carr, Trustee, respectfully requests this Honorable Court enter an Order continuing the Hearings on Motion to Compel Production of FLP Tax and Financial Reports and Amended Motion for Derivative Standing scheduled for July 15, 2025 to July 22, 2025.

Respectfully submitted,

/s/ Steven M. Carr

Steven M. Carr, Esq.

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